

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

NIELSEN & BAINBRIDGE, LLC, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-90071 (DRJ)  
)  
) (Jointly Administered)  
)  
) **Re: Docket No. 231**

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**CERTIFICATE OF COUNSEL FOR THE DEBTORS' APPLICATION  
FOR ENTRY OF AN ORDER (I) AUTHORIZING THE RETENTION AND  
EMPLOYMENT OF HILCO REAL ESTATE, LLC, (II) WAIVING CERTAIN  
TIMEKEEPING REQUIREMENTS, AND (III) GRANTING RELATED RELIEF**

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Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) certifies as follows:

1. On March 3, 2023, the Debtors filed the *Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Hilco Real Estate, LLC, (II) Waiving Certain Timekeeping Requirements, and (III) Granting Related Relief* [Docket No. 231] (the “Application”).

2. The deadline for parties to file objections and responses to the Application was March 24, 2023 (the “Objection Deadline”). No objections or responses to the Application were filed on the docket on or before the Objection Deadline. Counsel received informal comments to the Application from the Office of the United States Trustee for the Southern District of Texas,

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NBGHome>. The Debtors' service address in these chapter 11 cases is: 12303 Technology Boulevard, Suite 950, Austin, TX 78727.

which have been resolved by agreement. The substance of that agreement is reflected in the attached proposed order.

3. The Debtors request that the Court enter the attached proposed order at the earliest convenience of the Court. A redline reflecting changes to the proposed order is also attached.

Houston, Texas  
March 27, 2023

*/s/ Matthew D. Cavanaugh*

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**Certificate of Service**

I certify that on March 27, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh